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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION	MDL No. 2741
	Case No. 3:16-md-02741-VC
This document relates to: *Wooten v. Monsanto Co.* Case No. 3:16-cv-06706	**STIPULATION FOR VOLUNTARY DISMISSAL AND REFILING; PROPOSED ORDER**

Plaintiffs Karen Wooten, Harley Wooten III, and Timothy Wooten, individually and on behalf of the Estate of Harley Wooten, deceased (collectively herein “Plaintiffs”) and Defendant Monsanto Company, by and through their undersigned counsel, stipulate and agree as follows:

1. Plaintiffs commenced *Wooten v. Monsanto Co.*, Case No. 3:16-cv-06706, on November 18, 2016, in the Northern District of California;

2. According to the Complaint: Decedent Harley Wooten at all relevant times resided in the Central District of California, Plaintiffs Karen Wooten and Timothy Wooten at all relevant times resided in the Central District of California, and Plaintiff Harley Wooten III at all relevant times resided in the Eastern District of California.

ACCORDINGLY, the Parties STIPULATE and AGREE as follows:

1. Plaintiffs will voluntarily dismiss without prejudice *Wooten v. Monsanto Co.*, Case No. 3:16-cv-06706, and re-file this action in the Central District of California for transfer to MDL No. 2741 in the Northern District of California pursuant to 28 U.S.C. § 1407;
2. The subsequent filing of *Wooten v. Monsanto Co.* in the Central District of California will relate back to November 18, 2016, the date on which *Wooten v. Monsanto Co.*, Case No. 3:16-cv-06706, was initially commenced in the Northern District of California;
3. The Parties retain all rights, claims, and defenses regarding the statute of limitations that existed as of November 18, 2016 for all allegations, claims, and causes of action contained in *Wooten v. Monsanto Co.*, Case No. 3:16-cv-06706.

Dated: March 6, 2017

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By: */s/ Lori E. Andrus*
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Dated: March 6, 2017

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